

MALLORY CAMPBELL

1 five, possibly ten minutes.

2 THE COURT: Okay. And so after that, you'll
3 rest your proof?

4 MR. KNIGHT: Yes.

5 THE COURT: You intend to renew your motion?

6 MR. KNIGHT: Your Honor, I think I have to
7 procedurally.

8 THE COURT: Okay. And then I want you to rest
9 in front of the jury -- rest everything.

10 Do you -- do you anticipate any rebuttal?

11 MR. SEATON: No, Your Honor.

12 THE COURT: Okay. And then -- just thinking
13 about timing. Okay.

14 All right. Let's bring them in.

15 (The proceedings were held in the presence of
16 the jury, as follows:)

17 THE COURT: Okay. Thank you. Please be
18 seated.

19 All right. Mr. Knight, please call your next
20 witness.

21 (The witness was duly sworn.)

22 MALLORY CAMPBELL,
23 called as a witness at the instance of the parties,
24 having been first duly sworn, was examined, and
25 testified as follows:

DIRECT EXAMINATION

1
2 BY MR. KNIGHT:

3 Q. Could you state your name for the record,
4 please.

5 A. Mallory Campbell.

6 Q. And where are you employed?

7 A. I'm currently employed by the LaFollette Police
8 Department.

9 Q. Okay. Were you previously employed with
10 Campbell County Sheriff's Department?

11 A. Yes, sir.

12 Q. How long were you employed with the Campbell
13 County Sheriff's Department?

14 A. From December of 2012 up until September
15 of '22.

16 Q. Okay. So you were employed in June of 2019;
17 correct?

18 A. Correct.

19 Q. And do you recall this Nathan Ling incident?

20 A. I do.

21 Q. And at the time, were you a lieutenant --

22 A. I was.

23 Q. -- at Campbell -- okay. And as part of your
24 duties as lieutenant, were you on the patrol side, or
25 were you on the jail side?

1 A. I was -- my main duty was the jail corrections.
2 Q. So you supervised Catie Wilson; correct?
3 A. Correct.
4 Q. You supervised the four corporals; correct?
5 A. Correct.
6 Q. And you supervised the numerous corrections
7 officers that were under you; correct?
8 A. Correct.
9 Q. And did you play any role in selecting or
10 hiring any new correction officers?
11 A. Yes.
12 Q. Okay. Could you briefly describe for the jury
13 how -- if I wanted to be a correction officer in
14 Campbell County, Tennessee -- you were still a
15 lieutenant there -- what kind of training would I expect
16 to receive?
17 A. So once you're hired on, we did TCI, which is
18 the Tennessee Corrections Institute. It has categories
19 that we do have to cover like these certain topics and
20 then whatever else you deem necessary, which is policy
21 and procedure and all those types of things. So I would
22 do anywhere between 18 and 20 hours of classroom
23 training where it's just me and our new hires and we're
24 going over all those things that TCI wants us to go --
25 go over and then our policy.

1 For the next week and a half to two weeks, they
2 are simply shadowing. So they're following another
3 correction officer around. I did not want my new hires
4 who were still in the training phase to be active in
5 anything, so they -- whatever the corrections officers
6 got into within that week-and-a-half period, they would
7 just kind of be following along.

8 Q. What were some of the topics that you covered
9 in training, whether it be in the classroom or
10 shadowing?

11 A. You know, you want to try to cover everything,
12 so, I mean, I can't -- just all of our policy. We did
13 use of force. We did, you know -- 'cause in the jail,
14 you're -- you're taking care of someone's daily needs
15 every single day, so, I mean, you're -- you're going
16 over how to do a meal pass, how to do a med pass, how to
17 book people in, book people out. You're dealing with
18 the court system.

19 So, I mean, it's a lot to get in in -- in a
20 two-week period. But, you know, we try to cover as much
21 as -- what TCI requires of us and then the day-to-day
22 type of things.

23 Q. How long were you in corrections?

24 A. I was in corrections for the -- the entire time
25 that I worked there, which is 10 years, and then I

1 also -- I went to the police academy in 2018 to become
2 certified. So I did some narcotics investigations for
3 the sheriff's office part time as well.

4 Q. Okay. Were you always a lieutenant?

5 A. Like my entire time employed there?

6 Q. Yes.

7 A. No, sir, I started as a corrections officer.

8 Q. Okay. You started as a correction officer?

9 A. Uh-huh.

10 Q. Okay. You started as a correction officer.

11 A. Uh-huh.

12 Q. Did you possess the rank of corporal?

13 A. I -- I did.

14 Q. Sergeant?

15 A. And then sergeant, yes.

16 Q. Lieutenant?

17 A. Yes.

18 Q. Okay. Is it fair to say that in corrections,
19 some of the arrestees that are brought in that you're
20 to put -- to -- to provide, as you said, their daily
21 needs for are not really wanting to be confined?

22 A. I don't think anyone wants to be confined.

23 Q. Have you ever experienced an arrestee that was
24 combative?

25 A. Yes, sir.

1 Q. Have you ever experienced an arrestee scream at
2 you?

3 A. Yes, sir.

4 Q. Cuss at you?

5 A. Yes, sir.

6 Q. Spit at you?

7 A. Yes, sir.

8 Q. Have you ever been assaulted by an arrestee?

9 A. Yes, sir.

10 Q. Have you seen other corrections officers who
11 have experienced what you have described?

12 A. And worse, yes.

13 Q. And what do you mean "worse"?

14 A. Well, I -- I -- I've never been assaulted to
15 where I've needed emergency medical care, but I have
16 seen officers who have.

17 Q. Okay. Now, I want to shift gears on some
18 training because it's been alleged that Campbell County
19 has no training whatsoever with regard to intervening
20 when another officer is doing something
21 unconstitutional.

22 Do you agree or disagree with that?

23 A. I disagree.

24 Q. Why do you disagree with it?

25 A. Because I personally -- I was personally the

1 one who taught them to intervene. It was -- I mean, in
2 my training catalog, you won't find "duty to intervene"
3 'cause it's -- they didn't really have a -- you know,
4 you have to teach duty to intervene at that time. But
5 it was, you know, when you see an officer who is either
6 going too far or emotionally invested, you know, it is
7 your duty to tell them to leave your area, you know, tap
8 them out and -- for the sake of you and the inmate, you
9 know. So I -- I personally taught them better than
10 that.

11 Q. Have you had to perform internal investigations
12 concerning this issue?

13 A. This issue?

14 Q. Yes.

15 A. No, sir.

16 Q. Have you had to perform internal investigations
17 in general?

18 A. Yes, I did the IAs that were required in -- in
19 the jail. I conducted those IAs.

20 Q. And you would do an IA in the jail. That would
21 be -- the subject of the IA would be someone who was
22 employed on the jail side of the sheriff's department?

23 A. Correct.

24 Q. Is that correct?

25 A. Correct.

1 Q. And do you or do you not take -- did you or did
2 you not take complying with your training and the
3 policies of the jail seriously?

4 A. Yes, sir.

5 Q. With respect to this Nathan Ling situation,
6 when did -- it happened in the middle of the night;
7 correct?

8 A. Correct, to my understanding.

9 Q. And when did you first find out about it?

10 A. I want to think that this happened over the
11 weekend, if I'm not mistaken. I remember coming into
12 work, and he was -- he was -- already had left the
13 facility. And I was informed of it when I got to work
14 that morning.

15 Q. Okay. And what did you do, if anything,
16 concerning Mr. Ling? Did you start an IA investigation?

17 A. I did. I -- I started to gather -- I hadn't
18 started the investigation, per se. I was getting ready
19 to start it. So I was gathering video, trying to find
20 out -- you know, gathering logs, trying to find out who
21 was where and all those types of things. Just getting
22 my ducks in a row, I guess you would say.

23 Q. And you were told that someone else would
24 handle that; correct?

25 A. Correct. So when I was gathering everything

1 together, Chief Goins come in and said that he was going
2 to take over the IA, that he had more training and was
3 just better suited to do it. And so I gave him -- I
4 think by that time, I had the video pulled and I -- I'd
5 given him names of people I knew was there.

6 Q. Okay.

7 A. That's pretty -- I think that's about all that
8 I had at that time.

9 Q. Did you have any contact -- well, concerning
10 the TBI, you understood that the TBI -- that the -- an
11 outside agency had come in to investigate this incident;
12 correct?

13 A. Yes, sir.

14 Q. Did you ever or do you know of anyone who ever
15 withheld a document or anything from the TBI concerning
16 this incident?

17 A. Not to my knowledge.

18 MR. KNIGHT: Thank you. That's all I have.

19 THE COURT: All right. Did you have any
20 cross-examination?

21 CROSS-EXAMINATION

22 BY MR. SEATON:

23 Q. Ms. Campbell, we've never met; correct?

24 A. Not to my knowledge.

25 Q. I -- I haven't -- I haven't taken your

1 deposition; correct?

2 A. No, sir.

3 Q. All right, sir [sic]. And I want to show you
4 what we have put together as the chain of command at
5 the -- at the Campbell County Sheriff's Department. Is
6 that -- is that accurate at the time, 2019? I'm sorry.

7 A. It looks -- it looks to be. I don't know what
8 Sergeant Owens -- like, I don't know if he was sergeant
9 at the time, but --

10 Q. Okay. I mean --

11 A. But it looks -- on my side, yes.

12 Q. Okay. Fair enough. That's all I ask.

13 So on your side, this -- this was the chain of
14 command; right?

15 A. Yes, sir.

16 Q. All right. And Catie Wilson said that she
17 took -- took over the jail and would -- would -- her job
18 was to take care of the needs of the inmates and the
19 officers?

20 A. Okay.

21 Q. Right?

22 A. Yes.

23 Q. And that your job was to train?

24 A. One of my jobs, yes.

25 Q. What else was your job?

1 A. I did -- like I was saying, I did the IAs
2 inside the jail. I also -- after I went to the
3 police -- graduated the police academy, I was in charge
4 of doing any narcotics things that we had that would
5 start at the jail and lead to other -- otherwise, so --

6 Q. I'm not a police officer.

7 A. I'm sorry?

8 Q. What's -- what's an "IA"?

9 A. An internal investigation. So --

10 Q. All right.

11 A. -- if we had an officer inside the jail who we
12 thought were doing illegal things or just inappropriate
13 things, I would be the one investigating them.

14 Q. All right. So you're the primary one that
15 would have -- be assigned the task of doing the internal
16 things if you had officers going off the rails, doing --

17 A. Yes, sir.

18 Q. -- bad things; right?

19 A. Yes, sir.

20 Q. All right. And as you recall, on this -- on
21 this Nathan Ling incident, the jail side -- on your
22 side, the officers that were involved were Sean Brown,
23 Alexander Standridge, and Joshua Miller; right?

24 A. I believe so.

25 Q. All right. And then on the road side was

1 Justin Crabtree and Dakota Williams; right?

2 A. I believe so.

3 Q. And so is it your testimony that you trained
4 Alexander Standridge and Joshua Miller?

5 A. Yes.

6 Q. And if they said that you gave them four days
7 of training, that's all the training that they received,
8 would that be about right?

9 A. No. Like me -- like -- so like I said
10 previously, they'll get 18 to 20 hours with me in a
11 classroom and then two weeks of shadowing.

12 Q. Okay. But the 18 to 20 hours, that's --
13 what? -- about three days? Three to four days?

14 A. Uh-huh.

15 Q. All right. So that's -- and I -- that's
16 consistent with what they're saying, that they got --

17 A. Uh-huh.

18 Q. -- three to four days of training -- classroom
19 with you; right?

20 A. Uh-huh, yes, sir.

21 Q. And then they walked around with other
22 officers, what we call "on-the-job training"?

23 A. Yes, sir.

24 Q. All right. But that was the extent of their
25 training; right?

1 A. Yes, sir.

2 Q. All right. And neither Alexander Standridge or
3 Joshua Miller had gone to this TCI for the 40 hours of
4 training, had they?

5 A. That I -- I can't -- I don't know when they
6 would have went to that --

7 Q. Okay.

8 A. -- if it would have happened before or after
9 this.

10 Q. And during the three to four days of classroom
11 training that you would train them on, did you train
12 them with -- on the 450-page operations manual?

13 A. (No audible response.)

14 Q. Would you like to see it?

15 A. Yes, sir.

16 Q. Okay. That's Exhibit Number 1 to --

17 A. Okay.

18 Q. -- to our trial. Do you recognize that?

19 A. Yes, sir.

20 Q. And is that the operations manual that you all
21 used?

22 A. Yes, this is the policy and procedure. This
23 looks like it's the -- yes.

24 Q. And during the time that people would come in
25 as a new hire, would you all basically hand them this

1 policy manual, ask them to sign for it?

2 A. Yes, sir.

3 Q. And is it your testimony in three to four days
4 you were able to go through that, or did you go through
5 that whole -- the entire manual with them?

6 A. This is patrol's policy and procedure, but
7 they're a little bit different, but -- yes.

8 Q. So how big is your all's?

9 A. I mean, I would say it was similar in size.

10 Q. Okay. And would it be your testimony that you
11 went over the entire policy and procedures manual with
12 these people in three to four days?

13 A. Did I read this out loud to them? No.

14 Q. Okay. Or did you walk through them and -- and
15 walk through things such as use of force and that type
16 of thing?

17 A. Yes, sir.

18 Q. All right. And did anybody ever evaluate your
19 training program?

20 A. The sheriff and my captain have to sign off on
21 it. Do I ever -- I know that a lieutenant had come in
22 and sat in on a couple of classes with me.

23 Q. Okay.

24 A. But as a formal evaluation, I don't believe so.

25 Q. And if these officers have testified that they

1 didn't feel that they were adequately trained, you
2 dispute that?

3 A. Yes. I mean, I hate that they feel that way.
4 They did -- at the end of training, they did sign off
5 that they felt comfortable. There's a list that went in
6 their training file, and it was all the high points that
7 TCI wants you to cover, and they signed that they felt
8 comfortable.

9 And part of my speech was if you don't feel
10 comfortable signing this, we will go over -- don't sign
11 it. We will go over it till you feel comfortable after
12 this class is over.

13 Q. So you're the head person that they come to for
14 the internal investigations, you said?

15 A. The sheriff's office, yes.

16 Q. Or for -- for the jail?

17 A. For the jail, correct.

18 Q. All right. All right. So -- and so you
19 started an internal investigation over this Ling matter;
20 correct?

21 A. Correct.

22 Q. And why did you start an internal
23 investigation?

24 A. I think use of force to that degree, I just
25 feel that it would be necessary.

1 Q. To what degree?

2 A. To a degree that an inmate had to go to the

3 hospital.

4 Q. And be airlifted to a --

5 A. Correct.

6 Q. -- trauma center?

7 A. Yes.

8 Q. And so you started the investigation; right?

9 A. Yes, sir.

10 Q. How far did you get?

11 A. I got maybe the video pulled and was trying to

12 get names of who was actually there. That's about all

13 that I got -- I can recall getting done. I didn't get

14 much done.

15 Q. So did you get a day's worth done?

16 A. No, I got hours.

17 Q. Okay. And then you said that -- who came to

18 you and said, stop, I'm going to do it myself?

19 A. The chief deputy.

20 Q. Okay. And did you work under the chief deputy,

21 or did you work under Stoney Love?

22 A. My direct was Stoney Love.

23 Q. Okay. So how does that -- I mean, why would

24 the chief deputy be able to tell you --

25 A. I can't answer that.

1 Q. Pardon?

2 A. I can't answer that. That's something you
3 would have to ask him.

4 Q. All right. So you stopped the complete
5 investigation; right?

6 A. Yes, sir.

7 Q. And did you find out whether or not the
8 department had done any investigation on its own?

9 A. I mean, no, not -- I remember the chief deputy
10 saying he was working on it, but they didn't have to
11 tell me what they were doing.

12 Q. Did you know that -- that there was no
13 investigation done?

14 A. No.

15 Q. Pardon?

16 A. No.

17 Q. You never knew that?

18 A. No.

19 Q. Weren't you --

20 MR. KNIGHT: Objection. Mischaracterizing the
21 testimony, Your Honor.

22 THE COURT: Sustained.

23 BY MR. SEATON:

24 Q. Okay. Were you concerned that there was --
25 well -- okay. Let's -- I don't mean to mischaracterize

1 the testimony.

2 I -- I think that Chief Goins came in here
3 earlier and said he did -- he went out the next day one
4 day and -- and talked with -- with the neighbors. But
5 other than that, he stopped. Okay?

6 Were you aware of that?

7 A. No, sir.

8 Q. Were you concerned that there was no
9 investigation done in the department?

10 A. I just said I didn't know that there wasn't. I
11 trusted my superiors were doing what they told me they
12 were going to do.

13 Q. Were you aware -- or -- or did you have any
14 conversation with your superiors or Catie Wilson about
15 terminating any of these people that had used unlawful
16 force?

17 A. I can't remember if I did. You know, I talked
18 to the sergeant about a lot of things. Again, I was
19 told this was being investigated and that I didn't need
20 to concern myself with it, so I didn't.

21 Q. Okay. So you didn't concern yourself with
22 terminating anybody that was acting outside of their
23 training?

24 A. The chief deputy told me he was handling the
25 investigation. If the chief deputy wanted someone

1 terminated, I would assume that that would go to Stoney
2 Love and then to me.

3 Q. All right. So you're just saying that it's not
4 my job, push it on up, and so it's not my concern
5 anymore?

6 A. Correct. I mean, I believe that is my job
7 to -- my superiors told me to stand down, and that's
8 what I did. They were handling it.

9 Q. All right. And so wouldn't you have been --
10 well -- well, let me -- let me back up.

11 So the officers that were involved from the
12 correction side, did you feel that they had done
13 anything wrong?

14 A. As --

15 Q. Did you watch the video? I'm sorry. I didn't
16 mean to interrupt you. Did you watch the video?

17 A. Yes, sir.

18 Q. Okay. So you saw the whole video of what
19 happened?

20 A. Yes, sir.

21 Q. And do you feel that any of your corrections
22 people did things wrong?

23 A. I feel that after Mr. Ling was placed in a cell
24 that there should have been medical care probably
25 provided.

1 Q. Okay. And do you feel that they should have
2 intervened when all of this abuse was going on?

3 A. From what I can remember, I don't know how much
4 the corrections officers could have intervened. I think
5 that something should have been said, but I don't know
6 that they could have stopped Crabtree.

7 I just know that he should have been provided
8 medical care after he was placed in the cell, and that
9 did not happen.

10 Q. So weren't you concerned as the lieutenant of
11 the department that you're going to continue to have
12 Sean Brown as your -- as your corporal after this Ling
13 incident happened?

14 A. Again, my superiors told me that it was being
15 handled and investigated.

16 MR. SEATON: All right. Thank you.

17 THE COURT: Any redirect?

18 REDIRECT EXAMINATION

19 BY MR. KNIGHT:

20 Q. 45 days after this incident -- probably less
21 than 45 days after this incident, the TBI became
22 involved; correct?

23 A. I do not know the time frame. I do -- I do
24 know that they were involved.

25 Q. And they performed an investigation?

1 A. Yeah, I -- I'm assuming so.

2 Q. And you -- you've already testified that you

3 did not interfere and you don't know anybody who did

4 interfere in that investigation?

5 A. No, sir.

6 Q. And as a result of that investigation, a report

7 was generated to the district attorney; correct?

8 A. I would assume so. I don't know.

9 Q. You do know that Justin Crabtree was indicted?

10 A. Yes, sir.

11 Q. And pled guilty; correct?

12 A. Yes, sir.

13 Q. And so did Sean Brown; correct?

14 A. Yes, sir.

15 Q. That's all I -- oh, in -- in -- in a -- in

16 corrections, on occasion -- oh, every arrestee is

17 different. Is that fair to say?

18 A. Yes, sir.

19 Q. And on occasion, there has to be more than one

20 correction officer to get control of that arrestee?

21 A. Yes, sir.

22 MR. KNIGHT: Thank you.

23 THE COURT: All --

24 MR. SEATON: Nothing --

25 THE COURT: -- right.

1 MR. SEATON: -- further.

2 THE COURT: All right. Thank you.

3 THE WITNESS: Thank you.

4 THE COURT: All right. All right. Mr. Knight,
5 call your next witness.

6 MR. KNIGHT: Defense rests, Your Honor.

7 THE COURT: Okay. Defense rests.

8 All right. Mr. Seaton, do you have any
9 rebuttal?

10 MR. SEATON: No, Your Honor.

11 THE COURT: Okay. So plaintiff has rested.
12 Rested its entire case?

13 MR. SEATON: Yes, sir.

14 (Subsequent proceedings were heard but
15 not requested to be transcribed herein.)

16 END OF PROCEEDINGS

17 I, Stephanie Fernandez, do hereby certify that
18 I reported in machine shorthand the proceedings in the
19 above-styled cause, and that this transcript is an
accurate record of said proceedings.

20 s/Stephanie Fernandez
21 Stephanie Fernandez,
22 Official Court Reporter
23
24
25